

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>v.</b>	§	<b>3:22-CR-378-N</b>
	§	
<b>RAYNALDO RIVER ORTIZ,</b>	§	

**UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL  
AND PRETRIAL DEADLINES**

Defendant, **RAYNALDO RIVERA ORTIZ**, by counsel, hereby moves this Court for an order continuing the trial and related dates set in this case and for a finding of excludable time under the Speedy Trial Act as found in Title 18, United States Code, §§ 3161, *et seq.* In support therefore, counsel states as follows:

1. Trial is currently scheduled for December 12, 2022.
2. The defense requests additional time to review the voluminous discovery, perform an independent investigation of the facts of the case, and otherwise act to protect Dr Ortiz's rights.
3. This request is not made for purposes of delay, but so that justice may be served.
4. The government is not opposed to this request.

WHEREFORE, Defendant requests that his trial be continued for ninety (90) days or as the Court might otherwise direct, and that the concomitant pretrial deadlines set forth in the Court's prior scheduling order be similarly continue. Both defense and government counsel respectfully request that, to avoid scheduling conflicts, the Court refrain from setting trial for the week of March 13, 2023.

Respectfully submitted,

/s/ John M. Nicholson

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**CERTIFICATE OF CONFERENCE**

I certify I conferred with AUSA John De La Garza on November 17, 2022, and confirmed that the government is not opposed to this request.

/s/ John Nicholson

JOHN NICHOLSON

**CERTIFICATE OF SERVICE**

I hereby certify that on November 17, 2022, I electronically filed the foregoing document using the Court's CM/ECF system, thereby providing service on attorneys of record.

/s/ John Nicholson

JOHN NICHOLSON